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Attorneys for Defendant  
ADOBE SYSTEMS INCORPORATED

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**OAKLAND DIVISION**

DIGITAL REG OF TEXAS, LLC,

Plaintiff,

vs.

ADOBE SYSTEMS INCORPORATED, et al.,

Defendants.

Civil Case No. 12-CV-01971 CW (KAW)

**DECLARATION OF BYRON C.  
BEEBE IN SUPPORT OF ADOBE'S  
MOTIONS IN LIMINE NOS. 1-9 AND  
BRIEF REGARDING DISPUTED  
LEGAL ISSUES**

JUDGE: Hon. Claudia Wilken

DATE: August 25, 2014

TIME: 8:30 a.m.

CTRM: 2, 4th floor

1 I, Byron C. Beebe, declare:

2 1. I am a member of the Bar of this Court and an attorney with the law firm  
3 of Weil, Gotshal & Manges LLP, counsel of record for Defendant Adobe Systems Incorporated  
4 in the above-captioned matter. I submit this declaration based on personal knowledge and  
5 following a reasonable investigation. If called upon as a witness, I could competently testify to  
6 the truth of each statement herein.

7 2. Attached hereto as **Exhibit 1** is a true and correct copy of the January 23,  
8 2014 deposition transcript of Russell Parr.

9 3. Attached hereto as **Exhibit 2** is a true and correct copy of the expert  
10 damages report of Russell Parr, dated October 30, 2013.

11 4. Attached hereto as **Exhibit 3** is a true and correct copy of the October 21,  
12 2013 Digital Reg's Third Amended Responses to First Set of Common Interrogatories, DTX520.

13 5. Attached hereto as **Exhibit 4** is a true and correct copy of the April 26,  
14 2014 deposition transcript of Patrick E. Patterson.

15 6. Attached hereto as **Exhibit 5** is a true and correct copy of the March 28,  
16 2013 deposition transcript of Michael Roberts Farley.

17 7. Attached hereto as **Exhibit 6** is a true and correct copy of the March 26,  
18 2013 deposition transcript of Carl Vernon Venters.

19 8. Attached hereto as **Exhibit 7** is a true and correct copy of the April 18,  
20 2013 deposition transcript of Eugene B. Phillips, II.

21 9. Attached hereto as **Exhibit 8** is a true and correct copy of the March 24,  
22 2009 deposition transcript of Patrick E. Pattersen, Case No. 6:97-cv-467 (LED), DTX677.

23 10. Attached hereto as **Exhibit 9** is a true and correct copy of the March 19,  
24 2009 deposition transcript of Michael Farley, Case No. 6:07-cv-468 (LED), DTX678.

25 11. Attached hereto as **Exhibit 10** is a true and correct copy of December 18,  
26 2013 Stephen D. Prowse Rebuttal Expert Report.

27 12. Attached hereto as **Exhibit 11** is a true and correct copy of February 22,  
28 2013, letter from Paul M. Saraceni to Michael Farley regarding a sublicense under the '541

1 patent.

2 13. Attached hereto as **Exhibit 12** is a true and correct copy of the January 28,  
3 2014 deposition transcript of Stephen D. Prowse.

4 14. Attached hereto as **Exhibit 13** is a true and correct copy of Plaintiff  
5 Digital Reg of Texas, LLC's Responses and Objections to Defendant Adobe Systems  
6 Incorporated's First Set of Individual Interrogatories, dated November 7, 2012, DTX522.

7 15. Attached hereto as **Exhibit 14** is a true and correct copy of the January 20,  
8 2014 deposition transcript of Premkumar Devanbu.

9 16. Attached hereto as **Exhibit 15** is a true and correct copy of Plaintiff  
10 Digital Reg of Texas, LLC's Response to Defendant Adobe Systems Incorporated's Third Set of  
11 Interrogatories, dated March 27, 2013, DTX525.

12 17. Attached hereto as **Exhibit 16** is a true and correct copy of Plaintiff  
13 Digital Reg of Texas, LLC's Second Amended Response to Defendants' First Set of Common  
14 Interrogatories, dated February 22, 2013, DTX519.

15 18. Attached hereto as **Exhibit 17** is a true and correct copy of the March 27,  
16 2013 deposition transcript of Carl Vernon Venters.

17 19. Attached hereto as **Exhibit 18** is a true and correct copy of the April 25,  
18 2013 deposition transcript of Patrick E. Patterson.

19  
20 I declare under penalty of perjury that the foregoing is true and correct.

21 Executed on July 30, 2014, at Redwood Shores, California.

22 By: /s/ Byron C. Beebe  
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